

Date: October 24, 2018

To: Mike Cirian, USEPA

From: Laura Jensen, Roux
 CC: John Stroiazzo, Glencore
 Steve Wright, CFAC
 Dick Sloan, MDEQ
 Andrew Baris, Roux
 Michael Ritorto, Roux

Re: **Meeting Minutes for October 17, 2018**
Project Update/Technical Meeting to Discuss Phase II, Risk Assessment, and
Schedule
CFAC Remedial Investigation / Feasibility Study (RI/FS)

A project update/technical meeting was held on Wednesday, October 17, 2018 from 1:30 to 3:30 PM to discuss progress of the Phase II Site Characterization, the status of the Risk Assessment, and RI/FS schedule status. Prior to the meeting, an agenda was provided to all parties for review.

The following individuals attended all or portions of the meeting:

- Mike Cirian – USEPA
- Richard Sloan – MDEQ
- Collen Owen – MDEQ
- Gunnar Emilsson – CDM Smith
- Cheryl Driscoll – Glencore
- John Stroiazzo – Glencore
- Steve Wright – CFAC
- Mary Green – Ann Green Communications
- Michael Ritorto – Roux
- Laura Jensen – Roux

A summary of the agenda topics discussed and action items for each topic is provided below. Action items for USEPA or MDEQ are provided in red and action items for CFAC/Roux are provided in blue.

AGENDA TOPICS

1. Outstanding Items with USEPA

CFAC/Roux requested approval letters for the Final Background Sampling and Analysis Plan (SAP; submitted to USEPA on September 14, 2018) and the Final Baseline Human Health Risk Assessment Work Plan (BHHRA WP; submitted to USEPA on September 28, 2018). At the meeting, Mike Cirian of USEPA provided verbal approval of these documents and requested that CFAC/Roux follow-up with an e-mail request for approval letters. CFAC/Roux will follow up with e-mail requests in October and USEPA expects to provide approval letters in the following weeks.

CFAC/Roux also requested an update on USEPA's review of the responses to USEPA comments on the draft Baseline Ecological Risk Assessment Work Plan (BERA WP) which was submitted

to USEPA on August 31, 2018. At the meeting, Mike Cirian of USEPA provided his verbal approval of the responses to comments. CFAC/Roux will provide USEPA an e-mail describing that USEPA provided verbal concurrence with the comments and will finalize the document to submit the Final BERA WP to USEPA in October 2018.

CFAC/Roux requested an update on the review schedule for the Risk Assessment Interim Deliverable documents. All three interim deliverables were submitted to USEPA in the third quarter of 2018, including; Technical Memorandum for Proposed Wildlife Exposure Modeling Approach to Support the BERA submitted to USEPA on August 17, 2018; Technical Memorandum: Proposed Refined Ecological Screening Values to Support the BERA submitted to USEPA on September 25, 2018; and Interim Deliverable for the BHHRA WP submitted to USEPA on August 30, 2018. USEPA's consultant, CDM Smith, is currently reviewing the interim deliverables and expects to complete the review in November 2018. MDEQ anticipates completing their review in October 2018.

2. Upcoming Submittals to USEPA

CFAC/Roux reminded USEPA and MDEQ of the upcoming project submittals, including the draft Phase II Site Characterization Data Summary Report (Phase II DSR), draft Baseline Human Health Risk Assessment, and draft Baseline Ecological Risk Assessment which will be submitted to USEPA/MDEQ by March 1, 2019. CFAC/Roux are currently evaluating the data received thus far for the Phase II Site Characterization. These data, along with the Phase I data, will be summarized and evaluated in the Phase II DSR and risk assessment reports.

3. Phase II Fall Sampling Update

CFAC/Roux provided an update of the sampling performed in 2018 as part of the Phase II SAP and Background SAP. A tabulated summary of the sampling completed as of October 12, 2018 was shared with USEPA during the meeting and is provided below.

Phase II Round 1 Sample Collection

	Locations Sampled	Locations Dry*	Total Proposed Locations
Soil - Landfill	36	--	36
Soil - Main Plant Area	53	--	53
Soil - Monitoring Wells	37	--	37
Soil - Hand Augers	141	--	141
Soil - Rectifier Yard Hand Augers	16	--	16
Soil - Geoprobe	177	--	177
Soil - ISS borings	24	--	24
Sediment	10	6	16
Groundwater	76	1	77
Porewater	10	6	16
Surface Water	54	6	60
Background Surface Water	20	0	20
Total	654	19	673

*Dry surface water locations include North Percolation Ponds

Phase II Round 2 Sample Collection

	Locations Sampled* (as of 10/12/18)	Locations Dry**	Total Proposed Locations
Background Soil	20	—	20
Sediment	25	8	42
Background Sediment	15	0	20
Groundwater	49	5	77
Porewater	25	6	40
Surface Water	26	25	64
Background Surface Water	15	0	20
Total	175	44	283

*Phase II Round 2 sampling is ongoing and expected to be completed by end of October 2018

**Dry surface water locations include Northern Surface Water Feature, Cedar Creek Reservoir
Overflow Ditch, North Percolation Ponds

4. Overall Project Review

As described in an e-mail to USEPA on October 10, 2018, Roux understands that USEPA and CFAC would like to work together to look for efficiencies in the RI/FS Schedule with the ultimate goal of moving up the completion date of the RI/FS. CFAC/Roux provided a proposed revised schedule to USEPA with a RI/FS completion date moved up by approximately 4 months, from March 2021 to November 2020. The proposed changes to the schedule include completing the Candidate Technologies Memorandum as part of the FS Work Plan, rather than a standalone document; and reducing the time it takes for CFAC/Roux to prepare draft deliverables.

Mike Cirian of USEPA agreed with the advanced schedule and requested that CFAC/Roux provide a formal request to modify the AOC schedule by combining the Candidate Technologies Memorandum as part of the FS Work Plan. MDEQ stated that they were also in agreement within this proposed schedule. CFAC/Roux will remind USEPA of the revised schedule as they continue to submit project deliverables.

Cirian also noted that he would like to share this message with the public at the Community Liaison Panel/Public Meeting.

5. Demolition Update

John Stroiazzo (Glencore) provided an update regarding the demolition of the Main Plant being completed by their contractor, Calbag Resources, LLC (Calbag). Calbag is on target to complete the demolition by January 31, 2019. Calbag is currently hauling crushed concrete to the Flathead County Landfill, and continues to backfill potroom basements with material from the Borrow Pit as permitted by MDEQ. Eight of ten potroom basements have been backfilled, and Calbag estimates that all potrooms will be backfilled by mid-November 2018. The only structures remaining onsite are five silos and five buildings including warehouses, a former fabrication plant, and administrative offices. CFAC is currently engaged with Bonneville Power Administration (BPA) to discuss the future of the substation located in the east and west Rectifier Yards.

6. Miscellaneous Project Updates

Mike Cirian requested that CFAC/Roux share a Health and Safety Lessons Learned, as documented in weekly reports. CFAC/Roux will share the report with USEPA in the upcoming week.

USEPA provided an update regarding CFAC/Glencore's request to decrease the financial assurance being held by USEPA for CFAC. USEPA is estimating a \$2.5MM bond, rather than the \$2MM bond requested by CFAC/Glencore. USEPA said that the request is anticipated to be finalized in the fourth quarter of 2018.

Steve Wright of CFAC provided an update regarding Aluminum City residential well sampling. CFAC sent a letter to Aluminum City residents in September 2018 to notify residents that beginning in 2019, CFAC will reduce the sampling frequency of residential wells to twice per year. Steve has not received any negative feedback from Aluminum City residents.

7. Public Outreach

Mary Green of Ann Green Communications provided an update on project communications and reviewed the agenda for the upcoming Community Liaison Panel/Public Meeting. The attendance list for the meeting was reviewed with the group.

The group discussed potential dates for the next public meeting. Mary Green suggested a spring meeting/potential tour following the completion of the demolition. The group also discussed a potential meeting in July/August following USEPA's review of the draft Phase II DSR and risk assessments. Mary Green will solicit feedback from the public regarding potential dates for the next meeting.